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L A W Y E R S

E-Filed on 12/24/09

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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA Commercial Mortgage Company,

USA Capital Realty Advisors, LLC,¹

USA Capital Diversified Trust Deed Fund,
LLC,

USA Capital First Trust Deed Fund, LLC,²

USA Securities, LLC,³

Debtors.

Case No. BK-S-06-10725-LBR
Case No. BK-S-06-10726-LBR¹
Case No. BK-S-06-10727-LBR
Case No. BK-S-06-10728-LBR²
Case No. BK-S-06-10729-LBR³

CHAPTER 11

Jointly Administered Under Case No.
BK-S-06-10725 LBR

**Stipulation re Proofs of Claim Filed by
Harrison Family Trust Dtd 7/27/99**

Affects:

- ☐ All Debtors
☒ USA Commercial Mortgage Company
☐ USA Capital Realty Advisors, LLC
☐ USA Capital Diversified Trust Deed Fund, LLC
☐ USA Capital First Trust Deed Fund, LLC
☐ USA Securities, LLC

USACM Liquidating Trust (the "USACM Trust"), by and through its counsel,
Lewis and Roca LLP, and Harrison Family Trust, ("Harrison"), by and through
Marguerite F. Harrison and Thomas B. Harrison, Trustees, represent to the Court as
follows:

¹ This bankruptcy case was closed on September 23, 2008.

² This bankruptcy case was closed on October 12, 2007.

³ This bankruptcy case was closed on December 21, 2007

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1. Harrison filed multiple proofs of claim, portions of which were allowed and disallowed pursuant to orders of this Court.

2. According to the records of the USACM Trust, the unresolved amount of Claim 10725-02003 is \$23,530.06. The USACM Trust and Harrison agree that the Proof of Claim 10725-02003 is unresolved in the amount of \$140,000.00, not \$23,530.06, with \$60,000 of that amount related to an investment in the Castaic Partners Loan and \$80,000 of that amount related to an investment in Tapia Ranch Loan.

3. The USACM Trust and Harrison agree that Proofs of Claim 10725-02141 and 10725-02142 may be disallowed in their entirety since they represent claims for unremitted principal in Freeway 101 and Universal Hawaii that were allowed as part of claim 10725-02003.

4. Accordingly, the Trust and Halvorson stipulate and agree:

- The unresolved portion of Proof of claim No. 10725-02003 is \$140,000.00, \$60,000 of which is related to an investment in the Castaic Partners Loan and \$80,000 of which is related to an investment in the Tapia Ranch Loan.
- Proof of Claim 10725-02141 may be disallowed in its entirety; and
- Proof of Claim 10725-02142 may be disallowed in its entirety.

LEWIS AND ROCA LLP

By s/ John Hinderaker
Rob Charles NV (#6593)
John Hinderaker (AZ 18024
pro hac vice)
Attorneys for USACM Liquidating
Trust

Dated: December 9, 2009

MARGUERITE F. HARRISON

Marguerite F. Harrison
s/ Marguerite F. Harrison,

THOMAS B. HARRISON

Thomas B. Harrison
s/ Thomas B. Harrison
Trustees of the Harrison Family Trust Dated
7/27/99
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PREPARED AND SUBMITTED BY:

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